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AMAZON.COM SERVICES LLC

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ANNA "TASHA" MCKENZIE, an Individual,

Plaintiff,

v.

AMAZON.COM SERVICES LLC, a foreign
limited liability company,

Defendant.

Case No. 2:24-cv-00262-APG-NJK

**JOINT NOTICE OF SETTLEMENT
AND STIPULATION TO EXTEND
TIME FOR PLAINTIFF'S RESPONSE
TO DEFENDANT'S PARTIAL MOTION
TO DISMISS PLAINTIFF'S FIRST
AMENDED COMPLAINT (3RD
REQUEST); ORDER**

PLEASE TAKE NOTICE that Plaintiff, by and through her counsel of record, HKM Employment Attorneys LLP, and Defendant, by and through its counsel of record, Littler Mendelson P.C., have reached an agreement for a full and final settlement of Plaintiff's claims in this action. However, additional time is needed to finalize and review the settlement agreement and release.

The Parties further stipulate and request approval from the Court that the date for Plaintiff to file an Opposition to Defendants' Partial Motion to Dismiss (ECF No. 27) be extended by 60 days, from June 4, 2024, to August 5, 2024, so Plaintiff is not unduly prejudiced. This would be the Parties' 3rd request to extend Plaintiff's deadline to file an Opposition to Defendants' Partial Motion to Dismiss.

1 Extending the deadline would be in the interests of conserving both private and judicial
2 resources, and to ensure that the settlement agreement currently in place is not jeopardized.

3 The parties expect to submit to the Court a Stipulation and Order for Dismissal of the action
4 upon execution of a formal settlement agreement. The parties are currently working on finalizing
5 the terms of the written settlement agreement. The parties anticipate the Stipulation and Order to
6 be submitted to the Court within 60 days and request that the proposed order attached as Exhibit A
7 be issued by the Court.

8 IT IS SO STIPULATED.

9 Dated: May 29, 2024

10 HKM EMPLOYMNET ATTORNEYS LLP LITTLER MENDELSON, P.C.

12 /s/ Rebecca Rojas, Esq.

13 REBECCA ROJAS, ESQ.
14 DANA SNIEGOCKI, ESQ.

15 Attorneys for Plaintiff
16 ANNA "TASHA" MCKENZIE

/s/ Wendy M. Krincek, Esq.

13 WENDY M. KRINCEK, ESQ.
14 EMIL S. KIM, ESQ.

15 Attorneys for Defendant
16 AMAZON.COM SERVICES LLC

18 IT IS SO ORDERED:

19 Dated: June 3, 2024

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21 ANDREW P. GORDON
22 UNITED STATES DISTRICT JUDGE
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